

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	Civil Action No. 1:21-cv-00260-PB
-against-	:	
	:	
LBRY, INC.,	:	
	:	
Defendant.	:	
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**DECLARATION OF JOHN T. DIXON IN SUPPORT OF LBRY, INC'S
OBJECTION TO PLAINTIFF'S MOTION TO MODIFY SCHEDULING ORDER**

Pursuant to 28 U.S.C. § 1746, I, John T. Dixon, declare under penalty of perjury that the following is true and correct:

1. I am an attorney admitted to practice in the States of New York and Georgia. I am an attorney in the New York City office of Perkins Coie LLP and am admitted *pro hac vice* in this matter. I represent LBRY, Inc. ("LBRY") in this action. I make this Declaration upon personal knowledge and, if called upon to testify, could and would testify competently hereto.

2. Attached as **Exhibit A** is a true and correct copy of an email to Marc Jones, counsel for Plaintiff Securities and Exchange Commission, from Rachel Mechanic, counsel for LBRY, dated February 10, 2022.

3. Attached as **Exhibit B** is a true and correct copy of a production cover letter on behalf of LBRY dated February 11, 2022.

Dated: New York, New York.
February 14, 2022

Respectfully submitted,

/s/ John T. Dixon

John T. Dixon (*pro hac vice*)
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Attorneys for LBRY, Inc.